

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
RASHIAD SNEAD	:	VIOLATIONS: 18 U.S.C. §1951
a/k/a/"Smiley"	:	(Conspiracy to interfere with interstate
HOLLY WILLIAMS	:	commerce by robbery - 1 count)
JUNE CHANCE	:	18 U.S.C. §1951(a) (Interference with
	:	interstate commerce by robbery - 8
	:	counts); 18 U.S.C. §924(c)(1) (Using
	:	and carrying a firearm during and in
	:	relation to a crime of violence - 8 counts);
	:	18 U.S.C. §922(g)(1) (Felon in possession
	:	of a firearm - 1 count);
	:	18 U.S.C. §2 (Aiding and Abetting);
		Notice of Forfeiture

INDICTMENT

COUNT ONE

(Conspiracy to interfere with interstate commerce by robbery)

THE GRAND JURY CHARGES THAT:

Introduction

At all times material to this Indictment:

1. The following businesses were engaged in interstate commerce:
 - a. La Chaquita Grocery located at 657 North 9th Street, Reading, PA;
 - b. Buena Vista Grocery store located at 1200 Oley Street, Reading, PA;
 - c. Ralph's Food Market located at 146 Oley Street, Reading, PA;
 - d. Krick's Corner Store located at 1671 North 9th Street, Reading, PA;
 - e. International Deli located at 348 North 5th Street , Reading, PA;
 - f. Amazana Grocery Store located at 1400 Perkiomen Street, Reading, PA;
 - g. Bohn Grocery Store located at 1049 Franklin Street, Reading, PA; and

h. El Gallito located at 350 North 10th Street., Reading, PA.

2. From on or about May 19, 2003, through on or about May 27, 2003, in the Eastern District of Pennsylvania and elsewhere, defendants

**RASHIAD SNEAD,
a/k/a "Smiley"
HOLLY WILLIAMS,
and
JUNE CHANCE**

conspired and agreed together, and with others unknown to the grand jury, to obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, in that defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE and others unknown to the grand jury conspired to unlawfully take and obtain money and property from the person and in the presence of another and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, and to property in their custody and possession, in violation of Title 18, United States Code, Sections 1951(a), 1951(b)(1) and 1951(b)(3).

MANNER AND MEANS

It was part of the conspiracy that:

3. Defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE discussed robbing various convenience stores located in Reading, Pennsylvania.

4. Defendant HOLLY WILLIAMS, usually with defendant JUNE CHANCE, drove defendant RASHIAD SNEAD to the vicinity of convenience stores that they intended to rob.

5. Defendant RASHIAD SNEAD entered the stores with a loaded firearm, robbed the stores of United States currency and sometimes of merchandise, returned to the car and split the proceeds of the robberies with defendants HOLLY WILLIAMS and JUNE CHANCE.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants

RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE together committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

La Chaquita Grocery

On or about May 19, 2003:

1. Defendant RASHIAD SNEAD entered the La Chaquita Grocery located at 657 North 9th Street in Reading and pointed a gun at the store cashier. Defendant RASHIAD SNEAD took approximately \$150.00 and fled the store.

2. Defendant HOLLY WILLIAMS picked up defendant RASHIAD SNEAD at Moss and Oley Streets in Reading in her blue Mercury Marquis. Defendants RASHIAD SNEAD and HOLLY WILLIAMS split the money between themselves.

Buena Vista Grocery

On or about May 19, 2003:

3. Defendant HOLLY WILLIAMS drove defendants RASHIAD SNEAD and JUNE CHANCE in her blue Mercury Marquis to the Buena Vista Grocery located at 1200 Oley Street in Reading. Defendant RASHIAD SNEAD left the car while defendants HOLLY WILLIAMS and JUNE CHANCE waited in the car.

4. Defendant RASHIAD SNEAD entered the store, picked up a bottle of soda and approached the counter. Defendant RASHIAD SNEAD pointed a gun at the store cashier and said, "Give me the money." Defendant RASHIAD SNEAD took approximately \$50.00 and fled the store.

5. Defendant RASHIAD SNEAD returned to the car and defendant HOLLY WILLIAMS drove away. Defendant RASHIAD SNEAD handed the money to defendant JUNE CHANCE, who split it three ways among defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE.

Ralph's Food Market

On or about May 21, 2003:

6. Defendant HOLLY WILLIAMS drove defendants RASHIAD SNEAD and JUNE CHANCE in her blue Mercury Marquis to the vicinity of 146 Oley Street in Reading. Defendant RASHIAD SNEAD left the car while defendants HOLLY WILLIAMS and JUNE CHANCE waited in the car.

7. Defendant RASHIAD SNEAD entered Ralph's Food Market located at 146 Oley Street, Reading.

8. Defendant RASHIAD SNEAD approached the counter of the store, pointed a gun at the store cashier and said, "Give me all the money, everything." Defendant RASHIAD SNEAD took approximately \$240.00 and cans of cat food, and fled the store with the money and merchandise.

9. Defendant RASHIAD SNEAD returned to the car and handed the money to defendant JUNE CHANCE. Defendant HOLLY WILLIAMS drove the car while defendant JUNE CHANCE split the money three ways among defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE.

Krick's Corner Store

On or about May 24, 2003:

10. Defendant RASHIAD SNEAD entered Krick's Corner Store located at 1671 North 9th Street in Reading. Defendant RASHIAD SNEAD approached the counter, pointed a gun at the store cashier and demanded all of the money. Defendant RASHIAD SNEAD took approximately \$1,200.00 and fled the store.

International Deli

On or about May 25, 2003:

11. Defendant HOLLY WILLIAMS drove defendants RASHIAD SNEAD and JUNE CHANCE in her blue Mercury Marquis to the vicinity of 348 North 5th Street in Reading. Defendant RASHIAD SNEAD left the car and entered the International Deli located at 348 North 5th Street.

12. Defendant RASHIAD SNEAD approached the counter, pointed a gun at the store cashier and demanded money. Defendant RASHIAD SNEAD took approximately \$300.00 from the cash register and fled the store.

13. Defendant RASHIAD SNEAD returned to the car and handed the money to defendant JUNE CHANCE. Defendant JUNE CHANCE split the money three ways among defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE.

Amazana Grocery Store

On or about May 25, 2003:

14. Defendant HOLLY WILLIAMS drove defendants RASHIAD SNEAD and JUNE CHANCE to the vicinity of 1400 Perkiomen Street in Reading.

15. Defendant RASHIAD SNEAD left the car and walked approximately one block to the Amazana grocery store located at 1049 Franklin Street in Reading. Defendant RASHIAD SNEAD entered the store, approached the counter, pointed a gun at the store cashier, and demanded money. Defendant RASHIAD SNEAD took approximately \$300.00 from the cash register and fled the store.

16. Defendant RASHIAD SNEAD returned to the car and handed the money to defendant JUNE CHANCE. Defendant JUNE CHANCE split the money three ways among defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE.

Bohn Store

On or about May 27, 2003:

17. Defendant HOLLY WILLIAMS drove defendants RASHIAD SNEAD and JUNE CHANCE in her blue Mercury Marquis to the 1000 block of Franklin Street in Reading.

18. Defendant RASHIAD SNEAD left the car while defendants HOLLY WILLIAMS and JUNE CHANCE waited in the car.

19. Defendant RASHIAD SNEAD entered the Bohn store located at 1049 Franklin Street in Reading, approached the counter, pointed a gun at the store cashier, and demanded

money. Defendant RASHIAD SNEAD took approximately \$100.00 from the cash register and merchandise, including fruit punch, and fled the store.

20. Defendant RASHIAD SNEAD returned to the car and handed the money to defendant JUNE CHANCE. Defendant HOLLY WILLIAMS drove the car away while defendant JUNE CHANCE split the money three ways among defendants RASHIAD SNEAD, HOLLY WILLIAMS and JUNE CHANCE.

El Gallito Grocery Store

On or about May 27, 2003:

21. Defendant HOLLY WILLIAMS drove defendant RASHIAD SNEAD in her blue Mercury Marquis to 10th and Buttonwood Streets in Reading.

22. Defendant RASHIAD SNEAD left the car while defendant HOLLY WILLIAMS waited in the car.

23. Defendant RASHIAD SNEAD entered the El Gallito grocery store located at 350 North 10th Street in Reading, approached the counter, pointed a gun at the store cashier and demanded money. Defendant RASHIAD SNEAD took approximately \$350.00 and fled the store.

24. Defendant RASHIAD SNEAD returned to the car. Defendant HOLLY WILLIAMS drove the car to 1024 Locust Street where defendants RASHIAD WILLIAMS and HOLLY WILLIAMS counted and split the money among themselves.

All in violation of Title 18, United States Code, Section 1951(a).

COUNTS TWO THROUGH NINE

(Interference with interstate commerce by robbery)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 5 of Count One are realleged here.
2. On or about each of the dates set forth below, in the Eastern District of Pennsylvania at the locations listed below, the defendants identified below obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendants unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, money and property from the person and in the presence of another against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, and to property in their custody and possession, that is, by pointing a firearm at an employee of each store listed below and demanding money.

Count	Date	Defendants	Property Taken	Location
2	5/19/03	RASHIAD SNEAD HOLLY WILLIAMS	\$150.00	La Chaquita Grocery 657 North 9 th Street Reading, PA
3	5/19/03	RASHIAD SNEAD HOLLY WILLIAMS JUNE CHANCE	\$50.00	Buena Vista Grocery 1200 Oley Street Reading, PA
4	5/21/03	RASHIAD SNEAD HOLLY WILLIAMS JUNE CHANCE	\$240.00 and merchandise	Ralph's Food Market 146 Oley Street Reading, PA
5	5/24/03	RASHIAD SNEAD	\$1,200.00	Krick's Corner Store 1671 North 9 th Street Reading, PA

6	5/25/03	RASHIAD SNEAD	\$300.00	International Deli
		HOLLY WILLIAMS		348 North 5 th Street
		JUNE CHANCE		Reading, PA
7	5/25/03	RASHIAD SNEAD	\$300.00	Amazana's Grocery
		HOLLY WILLIAMS		Perkiomen Street
		JUNE CHANCE		Reading, PA
8	5/27/03	RASHIAD SNEAD	\$100.00 and	Bohn Grocery
		HOLLY WILLIAMS	merchandise	1049 Franklin Street
				Reading, PA
9	5/27/03	RASHIAD SNEAD	\$350.00	El Gallito Grocery
		HOLLY WILLIAMS		350 North 10 th Street
				Reading, PA

All in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNTS TEN THROUGH SEVENTEEN

(Using and carrying a firearm during and in relation to a crime of violence)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 3 through 5 of Count One are realleged here.
2. On or about each of the dates set forth below, in the Eastern District of Pennsylvania at the locations listed below, the defendants identified below knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a Ruger .357 magnum revolver, during and in relation to a crime of violence for which they may be prosecuted in a

court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Sections 1951(a) and 2, as charged in Counts Two through Nine of this Indictment.

Count	Date	Defendants	Location
10	5/19/03	RASHIAD SNEAD	La Chaquita Grocery 657 North 9 th Street Reading, PA
11	5/19/03	HOLLY WILLIAMS RASHIAD SNEAD HOLLY WILLIAMS JUNE CHANCE	Buena Vista Grocery 1200 Oley Street Reading, PA
12	5/21/03	RASHIAD SNEAD HOLLY WILLIAMS	Ralph's Food Market 146 Oley Street Reading, PA
13	5/24/03	JUNE CHANCE RASHIAD SNEAD	Krick's Corner Store 1671 North 9 th Street Reading, PA
14	5/25/03	RASHIAD SNEAD HOLLY WILLIAMS JUNE CHANCE	International Deli 348 North 5 th Street Reading, PA
15	5/25/03	RASHIAD SNEAD HOLLY WILLIAMS	Amazana's Grocery 1400 Perkiomen Street Reading, PA
16	5/27/03	JUNE CHANCE RASHIAD SNEAD	Bohn Grocery 1049 Franklin Street Reading, PA
17	5/27/03	HOLLY WILLIAMS RASHIAD SNEAD HOLLY WILLIAMS	El Gallito Grocery 350 North 10 th Street Reading, PA

All in violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT EIGHTEEN

(Felon in possession of a firearm)

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 29, 2003, in the Eastern District of Pennsylvania, defendant

**RASHIAD SNEAD,
a/k/a "Smiley,"**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, one Ruger .357 magnum revolver, Model PG100, bearing serial number 171-74-219, loaded with five live rounds.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 922(g) and 924(c), set forth in Counts Ten through Eighteen of this Indictment, the defendant

**RASHIAD SNEAD,
a/k/a "Smiley,"**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- 1. Ruger .357 magnum revolver, Model PG100, Serial No. 171-74-219.**
- 2. Five live rounds of ammunition.**

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney